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*Attorneys for Plaintiffs*

IN THE DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

ÖZCAN GENÇ, HASAN GÖKÇE, and  
SÜLEYMAN KÖŞ, on behalf of themselves  
and all other persons similarly situated,

Plaintiffs,

vs.

IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC, and IMPERIAL PACIFIC  
INTERNATIONAL HOLDINGS LTD.,

Defendants.

Civil Case No. 1:20-cv-00031

STATUS UPDATE TO MOTION TO  
APPROVE CLASS NOTICE

Judge: Manglona, C.J.  
Hearing: March 11, 2022  
Time: 1:30 p.m.

Plaintiffs submit this status update prior to the March 11 hearing on their Motion to Approve Class Notice (ECF No. 54) to apprise the Court of further information about the progress of securing class members' contact information.

Plaintiffs have compiled telephone numbers and postal addresses for 101 individuals out of the 104 named in the Excel spreadsheet obtained from IPI.<sup>1</sup> Plaintiffs do not have reliable email addresses for them, but they could receive notices electronically as PDFs or GIFs via

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<sup>1</sup> Class counsel will send this updated spreadsheet to the Court's USDCNMI inbox. The three persons on IPI's list for whom Plaintiffs do not have personal contact information – Caner Aksu, Volkan Koymen, and Mustafa Turan – were supervisors from former Defendant IDS Development Management Consultancy.

1 WhatsApp. Notices could also be sent out by First Class Mail. The cost would be \$1.65 (up to 2  
2 ounces) or \$2.40 (up to 3 ounces) per letter.

3 Also, Plaintiffs have arranged for a professional translation service in Turkey to provide a  
4 certified translation of the notice into Turkish.

5 Respectfully submitted this 9th day of March, 2022.

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7 BANES HOREY BERMAN & MILLER, LLC

8 /s/  
by Richard C. Miller, F0458  
9 Attorney for Plaintiff  
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